

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE CO.,
GEICO INDEMNITY CO., GEICO GENERAL
INSURANCE COMPANY and GEICO CASUALTY
CO.,

Docket No.:
15-cv-7236 (ERK)(RML)

Plaintiffs,

-against-

BRUCE JACOBSON, D.C., et al.

Defendants.

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SO-ORDERED STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co. ("Plaintiffs") and Defendants Bruce Jacobson, D.C., BMJ Chiropractic, P.C., NJ Pain Treatment, P.C., Jacobson Chiropractic, P.C., Dr. Bruce Jacobson DC P.C., NJ Neuro & Pain, P.C., Robert Klass, D.C., and Peter Albis, D.C., as follows:

1. Plaintiffs consent to vacate the defaults that have been entered in this action against Defendants BMJ Chiropractic, P.C., Jacobson Chiropractic, P.C., Dr. Bruce Jacobson DC P.C., Robert Klass, D.C., and Peter Albis, D.C. and, together with Defendants BMJ Chiropractic, P.C., Jacobson Chiropractic, P.C., Dr. Bruce Jacobson DC P.C., Robert Klass, D.C., and Peter Albis, D.C., jointly and respectfully move the Court to vacate the defaults that have been entered in this action against them, by entering the Order and Injunction in the form attached hereto as Exhibit "A".;

2. Defendants Bruce Jacobson, D.C., BMJ Chiropractic, P.C., NJ Pain Treatment, P.C., Jacobson Chiropractic, P.C., Dr. Bruce Jacobson DC P.C., NJ Neuro & Pain, P.C., Robert Klass, D.C., and Peter Albis, D.C. hereby appear in this action by their counsel, Steven I. Super, Esq. of Super Associates P.C., consent to the jurisdiction of this Court, and authorize Mr. Super to accept service of the Summons and Complaint;

3. Defendants Bruce Jacobson, D.C., BMJ Chiropractic, P.C., NJ Pain Treatment, P.C., Jacobson Chiropractic, P.C., Dr. Bruce Jacobson DC P.C., NJ Neuro & Pain, P.C., Robert Klass, D.C., and Peter Albis, D.C. waive any defenses or objections based on lack of personal jurisdiction attributable to improper service of process;

4. Defendants Bruce Jacobson, D.C., BMJ Chiropractic, P.C., NJ Pain Treatment, P.C., Jacobson Chiropractic, P.C., Dr. Bruce Jacobson DC P.C., NJ Neuro & Pain, P.C., Robert Klass, D.C., and Peter Albis, D.C.'s time to answer, move, or otherwise respond to the Complaint in this action is hereby extended to and including February 26, 2016; and

5. Plaintiffs and Defendants Bruce Jacobson, D.C., BMJ Chiropractic, P.C., NJ Pain Treatment, P.C., Jacobson Chiropractic, P.C., Dr. Bruce Jacobson DC P.C., NJ Neuro & Pain, P.C. consent to, and jointly respectfully move the Court for, entry of the Order and Injunction in the form attached hereto as Exhibit "A".

Dated: January ____, 2016

RIVKIN RADLER LLP

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